

Single Family Design Guidelines Update/ Neighborhood Preservation Ordinance Update

ISSUE PAPER D Part I

Floor to Lot Area Ratio and Lot Coverage Issues and Options

The purpose of this issue paper is to:

- Provide options and recommendations regarding the adoption of Floor to Lot Area Ratio (FAR) and/or lot coverage requirements.
- Reference the use of FARs and lot coverage requirements in other jurisdictions.

Introduction

In response to strong public interest, the City of Santa Barbara is working with the community to update the City's Single Family Design Guidelines and regulations which govern how single family homes are developed. The update involves revisions to the Neighborhood Preservation ordinance (NPO). This Issue Paper is the fourth issue paper in a series of issue papers being reviewed by a Steering Committee comprised of representatives from the Allied Neighborhood Association, City Council, Planning Commission, Architectural Board of Review, and the Historic Landmarks Commission. The reader may wish to refer to the first three issue papers which provide useful background regarding various definitions and methods involved with single family residential project review. This issue paper continues exploration of some preliminary ideas initially outlined in the first three issue papers and discussed by the Steering Committee. This paper also builds on those ideas, adding additional topics and options for consideration.

Floor to Lot Area Ratio (FAR) regulations are intended to help create uniformity and prevent sudden or dramatic changes in neighborhoods with similar lot sizes by limiting the size of homes relative to their lots. Floor to Area Ratio (FAR) requirements are being requested by some neighborhood residents. FAR's can give general guidance toward reasonable lot build-out according to lot size. Many communities have implemented FARs to better control size, bulk and scale of development. It may be difficult to establish FARs for all sectors of the City, even if FARs are deemed appropriate for parts of the City. FAR's were previously considered in the development of the NPO in the early 1990's and not adopted because they would be too restrictive and cumbersome. However, this topic is currently being revisited due to neighborhood demand. A dozen options for FAR regulatory methods are explored in this paper, arranged into three general categories as follows:

- FAR threshold which triggers ABR review
- Maximum FARs
- Incentive FARs. In the case that a maximum FAR is established, bonus FAR could be granted for certain good design components such as locating a garage behind a house or including a functional front porch.

This paper also includes a discussion of lot coverage. Generally, the FAR and lot coverage regulation options are discussed under separate headings in the paper. Part I of the Issue Paper outlines general option concepts and advantages and disadvantages. Part II of this Issue Paper discusses calculation method issues for both FAR and lot coverage regulation options.

Background

Floor to Lot Area Ratios

Floor to Lot Area Ratios (FARs) may be used to measure and limit a structure's actual and apparent volume compared to other homes. Jurisdictions generally define FAR as the gross square footage of a structure (or structures) divided by the total lot area, which often excludes road easements and utility rights-of-way. The City of Santa Barbara Municipal Code defines "floor area ratio" as:

"The area expressed as the ratio of floor area to total square footage of a parcel." (28.87.300.B5)

Applicants seeking Architectural Board of Review (ABR) or Historic Landmarks Commission (HLC) approval are required to provide the proposed project's floor area ratio when filling out the Design Review Project Statistics Form. On one version of the form, floor area ratio is defined as the "total of all existing and new floor area to lot area. Administratively, the lot area used in this calculation is a net lot area, which does not include public right-of-way easements. Covered parking is included in the square footage calculations for FAR.

In the City of Santa Barbara, Staff sometimes refers to FARs when analyzing a proposed project's neighborhood compatibility, but there is no maximum allowed ratio for single-family homes. The Neighborhood Preservation Ordinance states that, for homes greater than 2,500 square feet, an FAR of .35 or larger may trigger referral to the Architectural Board of Review:

"All new, and all additions to existing, single-residential and one-story duplexes, garages, and accessory structures on the lot will result in a combined floor area in excess of four thousand (4,000) square feet or a floor area to lot area ratio of thirty-five percent (35%) or greater." (22.68.060.B2)

During the 1992 NPO Update discussions, the City rejected using a single FAR maximum as being too simplistically restrictive. During the discussions it was agreed that consideration of different FARs for different lot sizes would be more appropriate than a single FAR. Staff is revisiting the issue due to new community interest and as a possible tool to assist the ABR and HLC in neighborhood compatibility determinations.

Lot Coverage

Many jurisdictions define a maximum percentage of a lot that can be covered by main and/or accessory structures, which sometimes include patios, driveways or pools. Lot coverage requirements preserve open space in a neighborhood by limiting the percentage of a lot that can be "improved," i.e. built upon. Lot coverage does not account for multiple stories; it is a two-dimensional measurement of the "footprint" of the structures on a site. Lot coverage is also used as a measure of the percentage of the lot that has been improved rather than landscaped or kept as open space.

Differences between FAR and lot coverage calculations stem from the fact that lot coverage is a two-dimensional measure of a lot's open space, whereas FARs more directly focus on a structure's volume.

Elements such as uncovered patios, balconies and paved surfaces are rarely included in FAR calculations but are often included in lot coverage calculations. The following site elements are often counted in lot coverage calculations:

- Accessory and mechanical buildings
- Balconies
- Basements
- Canopies
- Carports
- Cellars
- Decks
- Garages
- Interior courts
- Mechanical rooms
- Patios
- Paved surfaces
- Pools
- Porches

Lot coverage is typically calculated by one of four methods:

- Count all buildings and structures based on a gross measurement.
- Count all buildings and structures based on a “bird’s eye view” (including eaves).
- Count only habitable covered areas.
- Utilize “space allocation” maximum percentages for various site improvement categories.

More discussion of each measurement type is included in Part II of this issue paper, Calculation Methods.

The City of Santa Barbara Municipal Code does not establish a maximum coverage for any residential zone district; however, setback and open space requirements effectively limit the maximum coverage for any given lot, depending on its dimensions. The following diagrams and table illustrate how required setback and open yard areas occupy different proportions of a lot depending on lot size and the zone district’s setback requirements.

The diagrams were created using a few assumptions:

- **Rectangular Lot** of normal proportions
- **Open Yard Location:** If the required open yard were located somewhere other than overlapping the setback areas, it would occupy a larger portion of buildable area¹ than illustrated on the diagrams.
- **Driveway Area:** Driveway area in reality would vary by site access, building site layout and parking location, but for simplicity, it is estimated to be approximately 20 feet wide and half the length of a lot on the diagrams.

From these diagrams, approximate effective “lot coverage maximums” for lot sizes within each zone district were calculated. The results of the calculations are shown on the table, which demonstrates effective approximate maximum lot coverage for various size lots in each of the City’s single-family residential zones.

The diagrams and table show that setback and open space requirements place significant restrictions on coverage on small lots in single-family zones, particularly in zones with more restrictive setback requirements. The City’s setback requirements are most restrictive in the A-1 zone and least restrictive in R-1.

¹ Area not reserved for driveway, or required setbacks and open space.

Although the A-1 zone is intended for lots one acre or larger, over two dozen lots less than 7,500 square feet in area are zoned A-1. These lots are limited by setback requirements to no more than roughly 2,000 square feet of coverage. However, most lots less than 7,500 square feet in the City are zoned E-1 or E-3. Lots under 6,000 square feet and zoned E-1 (of which there are over 300 in the Mesa neighborhoods) are likely to be limited to about 1,500 square feet of lot coverage. Lots under 6,000 square feet zoned E-3 are limited to about 2,000 square feet of coverage, applying to over 300 lots in the Mesa neighborhoods and over 200 in the San Roque neighborhood.

FAR Issues

Existing ABR Trigger Perceived as Insufficient

Residents, especially some from the Mesa neighborhoods, have requested that the City implement FAR limits rather than using FAR solely as a design review trigger. Although the current FAR trigger provides project review by the ABR for some proposed projects with an FAR over .35, some residents would like the ABR to have more specific, quantitative tools to evaluate a project's neighborhood compatibility and site appropriateness. Some community members advocate additional quantitative FAR maximum requirements to help ensure consistent application of the Neighborhood Preservation Ordinance (NPO) and the Single Family Design Guidelines, and to prevent large homes out of character in neighborhoods of small lots.

Uncertainty of Correlation Between FARs and Neighborhood Compatibility

Homes with relatively large FARs are not necessarily larger than those with smaller FARs. For example, quantitatively speaking, a home that is no larger than its neighbors but located on a relatively small lot will have a larger FAR than its neighbors. An equally important factor may be the way the volume of a structure is arranged. Homes with the majority of the volume in the back of the lot will look smaller from the street, whereas homes with more volume in the front will appear more compatible when viewed from neighboring backyards. FARs also do not regulate a project's architectural quality. The City of Oakland rejected FARs because a visual survey led it to conclude there is no correlation between a home's FAR and its perceived compatibility with the surrounding neighborhood.

Sudden Home Size Changes in Neighborhoods

When residents make a large addition to their home, the sudden change can dramatically alter a neighborhood's appearance and create tension between neighbors. Because FARs limit home size relative to lot size, they can have a particularly strong impact on neighborhoods with small lots, where a sudden shift to larger homes is more likely to seem significant. FARs are therefore a potentially powerful tool for dealing with volume issues in neighborhoods with small lots.

Complete and Reliable FAR Data Not Always Available

Accurate lot size and building square footage can be challenging to obtain.

- **Lot Size.** The City's computerized "Permit Plan" project case tracking system has lot size data imported from the County Assessor. Staff gathered sample County Assessor lot data and compared the data with dimensions in official Assessor's Parcel books and found an average discrepancy of about a half of one percent (0.5%) between the two data sources (see the following table). This usually translates to less than a 50-square-foot

difference in lot size between the two sources. However, the public occasionally encounters examples where County Assessor data is inaccurate by hundreds of square feet. Generally, Permit Plan County Assessor lot data is used as a lot size estimate, while Assessor's Parcel books are relied on as an accurate source of data. Lot size survey reports are considered the most accurate source of data, but these reports are not required and are rarely submitted with Design Review applications.

The table below shows a random sample of discrepancies between official Assessor Parcel Book data and County Assessor GIS data. The formula used to derive percentage error is (Parcel Book Area – GIS Area) / Parcel Area.

Lot Size Discrepancy Between Assessor Datasets

APN	Parcel Book Area (sq. ft.)	County Assessor Area (sq. ft.)	Percentage Error
039-192-006	10768.00	10733.92	0.32%
039-191-011	7000.00	6997.06	0.04%
039-191-006	8400.00	8442.93	-0.51%
039-282-001	10721.40	10611.68	1.02%
039-292-010	7800.00	7867.26	-0.86%
039-291-022	5000.00	4966.27	0.67%
039-330-007	632.34	652.96	-3.26%
039-330-006	631.37	642.58	-1.78%
039-340-007	768.45	769.58	-0.15%
039-111-018	2167.50	2186.98	-0.90%
Avg. Percentage Error			-0.54%

Another important lot size consideration is whether there are recorded easements across a lot.

- **Public road right-of-way easements.** These particularly affect potentially buildable lot area. Although the easement area may appear to contribute to the open space of a lot if it has not been used by the City, that area would not appear to be part of the lot after road or sidewalk construction. Therefore, public road right-of-way easements are subtracted from the lot size for FAR calculations.
- **Utility easements.** Easements for telephone, gas, water or other utility lines do not typically affect which areas of a parcel are buildable, but occasionally an owner is not allowed to build on top of some underground utility lines. However, because these unbuilt-upon areas would appear as open space on the parcel, they are included in the lot size for FAR calculations.
- **Private easements, such as private roads.** Private easements vary in how they may affect a lot's apparent size. Many private easements may not be used. Where a private roadway easement is paved, it may appear as part of a normal driveway for a lot or it may appear as a road if it is on a property line. Since private easements vary as to whether they appear to contribute to a lot's open space, it is easier to include

private easements within the total lot size and assume that in most cases the private easement will contribute to a lot's apparent open space.

- **Floor Area.** The City does not have a comprehensive database of floor area information for single-family homes, nor could one be created easily. Square footage data can be found as follows.
 - Permit Plan. For the first years the computerized "Permit Plan" project case system was in place, only the proposed project addition size was recorded, but the existing sizes of structures on site were not recorded. In the past couple of years, Staff has fairly consistently included existing structure sizes in application project descriptions in the Permit Plan system. However, there is not a separate data field for existing structure size that can be easily queried to create trend reports. Staff has recently begun gradually gathering FAR data from information provided by applicants on the Design Review Project Statistics Form; however, this information may have been calculated inconsistently because the form does not provide specific instructions on how to calculate FAR; i.e. whether to use gross or net measurements and whether to include basements or garages in square footage calculations.
 - Archived Plans. Archived approved project plans can provide accurate square-footage data when permit plan information is incomplete, but substantial time is required to access these plans and determine existing square footage for a parcel. Some archived plans list summary square-footage data but do not indicate whether the data was measured via gross or net calculation methods. Depending on the architect, most archived plans more than five years old tend not to have summary statistics data listed. Archived plans with no data listed must be manually measured with a scale to determine square footage. Many historic plans do not indicate whether measurements are gross or net, further complicating consistent data gathering. Additionally, not all properties have archived plans on file. For example, homes built prior to the 1960s that have not been significantly altered or added on to are not likely to have archived plans on file. For these properties, on-site physical measurements of structures appears to be the only available option for collecting data. Because of this situation, it appears to be infeasible to require exact neighborhood square footage data for the closest 20 homes for all project applications.
 - Geographic Information Systems (GIS) Data. To complete general plan background research, the City recently invested in a GIS computer system. Using GIS, Staff can measure the footprint of existing structures as they appear on aerial photographs. The square footage of one-story structures could be fairly accurately calculated this way, although variation in eave overhangs would affect the accuracy of the project data. Staff has discussed the possibility of creating reports based on this data which may be able to be downloaded into the Permit Plan system. An outcome of the NPO Update could be that available approximate square footage data for the 20 closest homes to a project is required as part of project applications. In this case, the importance of the GIS square footage query project would likely be elevated.

Lack of Formal Calculation Methods of Floor to Lot Area Ratio

Although Staff and hearing body members sometimes take FARs into consideration when evaluating neighborhood compatibility, the lack of a detailed, standard calculation method can lead to confusion and disagreement among ABR members, Staff and the public. FARs are difficult for applicants to research and Staff to verify. Applicants are asked to write the proposed FAR on one version of the Development Application Project Statistics Form, but there are no written instructions or examples of how to calculate it. If the City of Santa Barbara establishes lot coverage requirements, it is equally important to create detailed calculation instructions for effective application.

Floor area ratios, while attempting to account for a structure's volume, do not do so perfectly, because floor area is a two-dimensional measure. Therefore, FAR requirements must be used carefully when dealing with special spaces such as rooms with very high ceilings, or attics and basements. At its June 25 and August 13 meetings, the Steering Committee began to discuss this issue as part of how net and gross square footage calculations relate to FAR definitions. This issue paper further considers FAR components. Issues associated with FAR calculations are as follows:

- Basements, cellars and attics
 - What are the differences between basements and cellars?
 - What makes a basement or attic “usable” or substantially visibly impactful? Should only usable or visible areas be included when calculating FAR?
 - Can a basement or cellar protrude up to a certain distance above final grade without the floor area counting toward FAR (because it does not significantly contribute to a structure's apparent volume), and what would that height be?
- Courtyards
 - Should interior courtyards count toward the square footage of a structure (because they contribute to a structure's apparent volume)?
 - How should exterior or attached, enclosed courtyards with walls over five feet tall be handled?
- Excessive volume beyond typical plate heights
 - What is a “typical” plate height and how far beyond this should be considered excessive?
 - How can FAR account for volume beyond typical plate height?

Please see Part II of this paper for options and recommendations on how to address these issues when calculating FAR or lot coverage.

Mid-Size Additions on Small Lots Discouraged Due to Existing Parking Requirements

This issue is not directly related to FARs or coverage requirements, but either of these types of regulations might help resolve it. The City's Municipal Code has a special requirement for structures “legally non-conforming” as to current parking standards. These structures can be expanded without bringing the parking up to current required standards of two covered parking spaces as long as the enlargement is no more than 50% of the existing floor area (Municipal Code 28.90.001). On relatively small lots in the City, it can be difficult to expand a one-car garage to a two-car garage without tearing down the existing garage and a significant portion of the existing house. This can be so costly that applicants who wish to expand by more than 50%

may choose to get the most value for the money spent on a remodel by demolishing most of a structure and then expanding as much as setback and open space regulations permit. As a result, applicants are effectively encouraged to either expand by just under 50%, or expand as far beyond that as possible. This could indirectly discourage mid-size additions.

Other Jurisdictions

FAR/Lot Coverage Requirement Prevalence

Several local jurisdictions use either FAR limits, lot coverage requirements or both to regulate the volume of single-family homes. The cities of Ventura, Camarillo and San Luis Obispo have implemented coverage requirements but not FAR limits; Summerland, Goleta and Montecito have FAR limits but not coverage requirements; and Carpinteria has both. As far as Staff is aware, none of these local jurisdictions use an FAR as a trigger for design review. It is also worth noting that the jurisdictions in Santa Barbara County with FAR limits tend to have more restrictive requirements than most other jurisdictions surveyed. The majority of jurisdictions, local or otherwise, that implement FAR limits or coverage requirements do not adopt both methods. Carpinteria is a local exception, as it has both FAR limits and lot coverage requirements.

The attached tables 1 through 6 detail the FAR and lot coverage requirements of several jurisdictions in California. Some of these jurisdictions have just a single, maximum value that applies to all single-family lots citywide, regardless of lot size (including Carpinteria, which has a uniform .4 FAR for single-family lots). However, it is common for the requirements to become stricter (ratio or percentage decreases) as lot size increases in order to provide open space and prevent the construction of homes too large for their lots and/or neighborhoods. The requirements also often vary by zone district. In the majority of jurisdictions surveyed by Staff, the most restrictive lot coverage requirements are between 30% and 40% in large-lot zone districts. Jurisdictions may require smaller FARs as slope increases in hillside areas. It is not uncommon for jurisdictions to implement FAR requirements that incorporate several of these characteristics. Accordingly, FAR and coverage requirements are often unique to a particular city. Jurisdictions with either FAR or lot coverage limits usually combine the limits with design review and other development standards. For example, a jurisdiction with FAR regulations might also implement second-story setback requirements (see Option 11A).

The following tables summarize different sets of potential maximum allowed FAR requirements. The average was calculated for each lot size by examining the FAR requirements of 17 California jurisdictions (see tables 1 and 2). Nine of these jurisdictions explicitly count covered parking in FAR calculations and eight explicitly do not count covered parking. The table also lists the maximum possible home size for each lot size and FAR. For example, .39 is the average FAR requirement for 5,000-square-foot lots in jurisdictions that count, and this corresponds to a 2,250-square-foot maximum home.

In the top table, the City of Goleta, which does not count covered parking in FAR calculations, is compared to the average of the surveyed jurisdictions that also do not count covered parking. The table shows that the City of Goleta has more restrictive FAR requirements than the average of other jurisdictions that do not count covered parking. The bottom table compares the

surveyed jurisdictions that do count covered parking in FAR to a .4 FAR proposed for all lot sizes by the Marine Terrace Preservation Group. The bottom table assumes the proposed .4 FAR includes covered parking in square footage calculations. Compared to the average FAR requirements of jurisdictions that count covered parking in FAR, the proposed .4 FAR is more restrictive for small lots and less restrictive for large lots. In the two rightmost columns of the bottom table, 500 square feet is added to the maximum allowed home sizes in jurisdictions that do not count covered parking. 500 square feet represents the size of a garage, and is added so the FAR requirements in jurisdictions that count covered parking toward square footage can be more accurately compared to the FAR requirements in jurisdictions that do not count covered parking.

Maximum Allowed FAR Values - Covered Parking Not Counted

	Average of 8 surveyed jurisdictions		City of Goleta	
Lot size	<i>FAR</i>	<i>Max. home size</i>	<i>FAR</i>	<i>Max. home size</i>
5000 sq. ft.	.39	1950	.32	1600
6000 sq. ft.	.36	2160	.32	1900
7000 sq. ft.	.34	2380	.31	2180
8000 sq. ft.	.33	2640	.30	2430
9000 sq. ft.	.32	2880	.29	2650
10000 sq. ft.	.32	3200	.28	2830
11000 sq. ft.	.30	3300	.27	2970
12000 sq. ft.	.30	3600	.26	3110
13000 sq. ft.	.30	3900	.25	3210
14000 sq. ft.	.29	4060	.24	3310
15000 sq. ft.	.29	4350	.23	3410

Maximum Allowed FAR Values - Covered Parking Counted

	Average of 17 Jurisdictions with 500 Sq. Ft. Garage Added for Jurisdictions That Exclude Garages		Average of 9 Surveyed Jurisdictions		City of Goleta With 500 Sq. Ft. Garage Added		Mesa Neighborhood Association Proposal	
Lot size	<i>FAR</i>	<i>Max. home size</i>	<i>FAR</i>	<i>Max. home size</i>	<i>FAR</i>	<i>Max. home size</i>	<i>FAR</i>	<i>Max. home size</i>
5000 sq. ft.	.48	2379	.46	2300	.42	2100	.40	2000
6000 sq. ft.	.44	2651	.44	2640	.40	2400	.40	2400
7000 sq. ft.	.42	2941	.43	3010	.38	2680	.40	2800
8000 sq. ft.	.41	3244	.42	3360	.37	2930	.40	3200
9000 sq. ft.	.39	3526	.41	3690	.35	3150	.40	3600
10000 sq. ft.	.39	3888	.41	4100	.33	3330	.40	4000
11000 sq. ft.	.37	4082	.40	4400	.32	3470	.40	4400
12000 sq. ft.	.36	4373	.39	4680	.30	3610	.40	4800
13000 sq. ft.	.36	4654	.38	4940	.29	3710	.40	5200
14000 sq. ft.	.35	4852	.37	5180	.27	3810	.40	5600
15000 sq. ft.	.35	5179	.37	5550	.26	3910	.40	6000

FAR Impressions

Staff interviewed over half a dozen jurisdictions regarding their impressions of how well FAR regulations work. Most staff members in other jurisdictions interviewed reported they found FAR limits to be a non-problematic way to address volume issues in their communities. However, many had the following concerns about their current FAR limits:

- **High-quality architecture not assured.**
- **Significant design factors not controlled:**
 - Structure's location on a lot.
 - Arrangement of structure's components.
 - Scale of architectural elements.
- **Irregular maximum allowed floor areas** can result when lot sizes within a neighborhood vary greatly.

Some jurisdictions have rejected the use of FARs altogether for the following reasons:

- **Redundant** with existing setback and open space requirements. (City of Turlock)
- **Too inflexible and proscriptive.** (City of Santa Rosa)
- **Too complex.** (City of San Rafael)
San Rafael felt it was easier to interpret and implement a size limit on upper-story additions instead.
- **Large lot regulatory ineffectiveness.** (County of Santa Barbara)

The County did not include FAR regulations in the recently adopted Toro Canyon Plan because lots in Toro Canyon are typically an acre or larger. FARs have proven generally ineffective in addressing large-house issues in the Montecito Community Plan area because lots in Montecito tend to be large as well.

- **Neighborhood compatibility:** No correlation found with perceived neighborhood compatibility. (City of Oakland)

Options

Twelve general options regarding FAR and lot coverage regulations have been identified by Staff for Steering Committee review. The options listed on the following page are grouped into three categories; triggers, maximums and incentives. Many of the options are described as several variations of one general option idea. The sub-options and options combined total almost two dozen approaches to consider. To help prepare for efficient discussion of this issue paper, Staff recommends using the attached worksheet. The worksheet provides an opportunity to track comments and questions for each option as well as overall initial support for each option. Staff further recommends that the Steering Committee carefully consider public comment regarding the options at the Steering Committee meetings. Public comment at all Steering Committee meetings is important, but public comment on this topic is especially important for the following reasons:

- **Strong Interest.** This topic has been specifically requested by the public for consideration for some time.
- **Unprecedented.** FAR or lot coverage requirements, especially maximum requirements, would represent a very different and new approach to regulating single-family residential land use. Staff would only recommend maximum requirements be adopted if neighborhoods are in favor.
- **New Insights.** There are many ways to implement FARs regulations within trigger, maximum or incentive methods. Public comments in favor of or against certain options may reveal options' strengths or weaknesses Staff may not have considered or identified in this paper. Analyzing the appropriateness of the options should be a collaborative effort between the public, the Steering Committee and Staff.
- **Individual Requests.** Two options, regarding one-story project incentives and flexible covered parking requirements (Options #8 and #9, respectively) have been listed because they were specifically requested by individuals for consideration at a Mesa or San Roque neighborhood workshop or through a public comment letter. Staff has honored these individual requests and analyzed and presented these options in this paper. However, more than a few individuals should support these options in public comment if they are to be further considered. This is important because implementing these two options could lead to potentially significant changes in neighborhood private open space patterns or street parking availability.
- **Neighborhood Association Input Specifically Requested.** Due to the importance of this topic, Staff mailed copies of this issue paper to homeowners' groups and asked members to study the papers, discuss the papers at their neighborhood meetings if time permits and provide comment. Staff hopes this may yield comment letters from at least some of the neighborhood associations.

Because of the special importance of public comment, Staff has simply listed advantages and disadvantages for each option rather than providing comprehensive recommendations. The only specific Staff recommendations are in Part II of this issue paper regarding calculation methods.

Options List

Triggers

Option #1: FAR Trigger for ABR Review.

1A: Status Quo.

1B: Change Current Trigger.

Maximums

These options are generally listed from the least complex regulatory method to the most complex regulatory method.

Option #2: FAR or Lot Coverage Maximums by Lot Size Citywide.

2A: FAR Maximums Only.

2B: Lot Coverage Maximums Only.

2C: FAR and Lot Coverage Maximums Combined.

Option #3: Marine Terrace Neighborhood Preservation Group Proposal: Maximum FAR of .4 for Mesa Neighborhood Alone.

Option #4: FAR or Lot Coverage Maximums Varied by Zone District.

Option #5: FAR or Lot Coverage Compatibility Requirement.

5A: Neighborhood Compatibility Worksheet for FARs.

5B: Neighborhood Compatibility Worksheet for Floor Area.

Option #6: FAR or Lot Coverage Maximums Varied by Slope.

6A: FAR Maximums Varied by Slope.

6B: FAR Maximums Varied by Slope and Lot Size.

6C: Lot Coverage Maximums Varied by Slope.

Incentives

Option #7: FAR Incentives for “Good Design.”

Option #8: One-Story Recorded Condition.

8A: Allow Encroachment upon Required Open Space.

8B: Less Restrictive FAR or Coverage Requirements.

Option #9: Flexible Covered Parking Requirements.

9A: Low Project FARs.

9B: Limited Number of Bedrooms.

9C: One Covered and One Uncovered Space for Constrained Lots

Option #10: “Built Out” Home Considerations.

Alternatives

Option #11: Alternatives to FAR or Lot Coverage Requirements.

11A: Second-Story Setback Requirements.

11B: Limit Second Stories to a Certain Percentage of First-Floor Footprint.

11C: Angle Plane Requirements.

Option #12: Steering Committee Crafted.

Option #1: FAR Trigger for ABR Review.

1A: Status Quo.

No FAR or lot coverage limits would be enacted. The current .35 FAR trigger for ABR review would remain.

Advantages:

- Avoids difficult task of determining appropriate FARs.
- Disadvantages of other Options listed avoided.

Disadvantages:

- Continues a system many residents find inadequate.
- Potentially effective tools not implemented.
- Does not provide the ABR additional tools.
- Neighborhood disagreements are likely to continue.

1B: Change Current Trigger.

The cities of Cupertino and San Jose also have FAR triggers for design review. In Cupertino, a .35 FAR triggers design review of two-story single-family homes. In San Jose, all single-family home projects are subject to a .45 trigger for review and a .65 trigger for a public hearing. It is possible to alter the current trigger in order to change the number of single-family projects undergoing ABR review. A **less restrictive trigger** would reduce the workload of the ABR and allow applicants and architects more flexibility. The City could establish alternative design review methods, such as additional Staff review or more specific development standards that may be just as effective while reducing the reliance upon ABR review. A **more restrictive trigger** could encourage residents to reduce the volume of their projects in order to avoid the added time and expense of the ABR review process. Steering Committee guidance as to whether the ABR FAR trigger should be higher or lower, and by how much, would be needed to implement this option.

One way to change the types of projects triggered for ABR review by the NPO without changing the FAR trigger is to remove or revise exemption criteria listed in NPO Checklist #13. NPO Checklist #13 currently exempts projects from ABR review if they do not meet several miscellaneous design criteria. If all projects above current height and size triggers were to undergo ABR review regardless of design criteria, a larger ABR workload would be created. However, poorly designed projects that might otherwise have been designed to avoid triggering NPO miscellaneous design criteria would be included in the larger ABR caseload, and better designs could result. Staff plans to more thoroughly present possible changes to the application routing triggers in the “Application Routing Methods Issue Paper,” scheduled for review this winter. Possibilities for additional Staff administrative review or Single Family Residential Design Guidelines applicability for some applications exempted from ABR will be outlined in

that issue paper. Additional analysis of trigger change impacts will also be provided in that issue paper.

Option #2: FAR or Lot Coverage Maximums by Lot Size Citywide.

Creating a limit for FAR, lot coverage or both would lead to several non-conforming lots. For all of the sub-options within this option, the Steering Committee may wish to consider an exemption for lots made non-conforming, as discussed in Option #10.

Option 2A: FAR Maximums Only.

The “Other Jurisdictions” section above discusses the use of FAR maximums. Staff recommends that, if the Steering Committee would like to consider FAR maximums, an appropriate range of FAR values may be in between the requirements of Goleta and the average requirements of other jurisdictions (see table, “Maximum Allowed FAR Values Summarized,” above).

Jurisdictions may also limit the absolute floor area of structures on a lot regardless of lot size. This limit is sometimes in addition to FARs because a jurisdiction may feel there is a point at which a home is simply too large, regardless of its surroundings. In the City of Los Altos, specified FAR limits get more restrictive as lot size increases until, for lots 32,000 square feet and larger, floor area is limited to 6,000 square feet. A single maximum FAR applying to all single-family lots theoretically allows for acres of floor area on large enough lots. Therefore, FARs can be made increasingly restrictive as lot size increases, up to the size of the largest lots found in a particular jurisdiction, at which point square footage is capped.

Advantages:

- Would prevent overly voluminous development proposals, especially on small lots (under approximately 9,000 square feet).
- A higher assurance of neighborhood compatibility in neighborhoods with mostly small lots, such as the Mesa and East San Roque, would result.
- May help to ensure a consistent design review process by providing a quantitative standard for considering volume neighborhood compatibility issues.
- Accounts for volume more than do setback and lot coverage requirements by measuring the floor area of multiple stories.
- Some ABR re-submittal processes may be curtailed. For example, the ABR may request a smaller structure proposal more compatible with the neighborhood, but applicants in some cases do not respond to the ABR requests adequately. This can lead to repeated ABR re-submittal hearings without a sense of progress. However, the ABR feels unable to provide specific quantitative directions to applicants. The “Make it smaller”; “By how much?”; “Show us and we’ll find out” conversation sequence and associated serial ABR reviews could be avoided with specific quantitative FAR maximums in place. Some ABR members have commented that they can make a structure beautiful through architectural detail suggestions more easily than they can make a structure compatible in size through suggestions.

Disadvantages:

- Determining an appropriate maximum FAR is difficult.
- Does not completely account for volume because plate heights can vary (See options to address this in Part II: Calculation Methods).
- A number of properties may become legally non-conforming in regards to FAR. (See further discussion of implications in Option #10).
- See other jurisdictions' concerns regarding design, irregular maximum allowed structure sizes, redundancy, inflexibility, complexity and large lot inapplicability in "Other Jurisdictions" section above.

2B: Lot Coverage Maximums Only.

Maximum lot coverage requirements could be implemented based on lot size. The City currently limits lot coverage by lot size indirectly through setback and open yard requirements. Currently, much higher de facto lot coverage is allowed on larger lots. If lot coverage is to be regulated directly with different lot coverage maximums for different lot sizes, lowering allowed maximum lot coverage for larger lots would be more consistent with other jurisdictions' lot coverage regulations.

Lot coverage requirements could also be based on surrounding neighborhood density. This approach could help ensure a lot's amount of open space is compatible with the amount on nearby lots.

Limits on lot coverage but not FAR can encourage residents to build vertically rather than horizontally. If maximum lot coverage limits are set at a very strict level, some applicants would need to build a second story rather than expand into yard area for some additions. This situation is exacerbated when no FAR limits are in place.

Advantage:

- Quantitative standard to consider compatibility.

Disadvantages:

- Potential to encourage vertical construction.
- Does not account for volume.
- See other jurisdictions' concerns regarding FAR maximums in "Other Jurisdictions" section above. These issues could also apply to lot coverage maximums.

2C: FAR and Lot Coverage Maximums Combined.

With both lot coverage and FAR limits in effect, the pressure to build vertically may not be as great as it would with lot coverage requirements alone, as FAR accounts for the floor area of multiple stories.

Advantages:

- No regulatory incentive to exceed one story.
- Provides greater control over volume than using one technique alone.

Disadvantage:

- Multiple new restrictions would create a more complicated application process.

Option #3: Marine Terrace Neighborhood Preservation Group Proposal.

If the Steering Committee does not wish to consider FAR maximums for the City as a whole, it may wish to consider a maximum FAR of .4 for the Mesa neighborhood alone due to residents' requests. Marine Terrace Neighborhood Preservation Group correspondence indicates the organization mailed a questionnaire to 470 Marine Terrace residences and 85% of the 135 respondents were in favor of a .4 FAR. The proposal is for the Marine Terrace subdivision consisting of approximately 470 lots in the range of 6,000 square feet each. For this Issue Paper, Staff has analyzed the proposal as it would apply to all "Mesa" areas, that is for the West, East and Alta Mesa General Plan neighborhood geographic areas.

The following table shows the maximum home size that would be allowed if a maximum .4 FAR were applied to various lot sizes.

Maximum Home Size by Lot Size with .4 FAR

Lot size	Proposed FAR	Resulting max. home size
5000 square feet	.40	2000
6000 square feet	.40	2400
7000 square feet	.40	2800
8000 square feet	.40	3200
9000 square feet	.40	3600
10000 square feet	.40	4000
11000 square feet	.40	4400
12000 square feet	.40	4800
13000 square feet	.40	5200
14000 square feet	.40	5600
15000 square feet	.40	6000

There is a wide range of lot sizes on the Mesa. The next table illustrates the number of parcels that fall within ranges of lot size for the single-family zone districts on the Mesa. For example, the Mesa has 341 parcels under 6,000 square feet zoned E-1. When this information is combined with the above table, "Maximum Lot Coverage in Santa Barbara Based on Zoning Requirements and Lot Size," it is evident that a .4 FAR will decrease the maximum allowed home size on Mesa lots. Current open space and setback requirements limit first-story size, but adding a second story of the same size is permitted under existing zoning regulations. For example, on a 6,000-square-foot lot in the E-1 zone, the first story is limited to roughly 1,500 square feet, but adding a 1,500-square-foot second story results in a 3,000-square-foot home, larger than the 2,400 square feet that would be allowed with a .4 FAR. However, ABR review often results in projects smaller than the zone districts allow to ensure neighborhood compatibility.

East, West and Alta Mesa Neighborhood Lots

	<6000	6001-7500	7501-10000	10001-15000	>15000	Total
A-1	0	3	1	6	24	34
A-2	0	0	0	0	4	4
E-1	341	122	272	430	205	1370
E-3	202	671	526	176	130	1705
R-1	6	1	0	0	0	7
Total	549	797	799	612	363	3120

Advantages:

- Existing, known support among some residents.
- See Option 2 advantages.

Disadvantage:

- Is perceived as too restrictive by some residents.
- See Option 2 disadvantage

Option #4: FAR or Lot Coverage Maximums Varied by Zone District.

The Steering Committee may wish to set different FAR or coverage limits for each zone district in order to account for differences in setback requirements. Some jurisdictions require more restrictive maximum FARs in zones intended for large lots. However, this may appear to be unfair to owners of small, legally non-conforming lots within those zones. There are several such lots in all of the City's single-family residential zones, with different setback requirements independent of lot size. Zones intended for larger lots, such as A-1, have more restrictive setback requirements than zones intended for small lots, such as R-1. One way jurisdictions avoid this issue is by allowing homes to be at least a certain size, regardless of FAR or lot coverage limits.

Advantage:

- Integrates new requirements with existing requirements.

Disadvantages:

- May require complex fine-tuning in order to achieve desired results.
- Further complicates task of choosing appropriate maximum FAR or lot coverage.

Option #5: FAR or Lot Coverage Compatibility Requirement.

The City could require the FAR of a single-family project to be similar to the FARs of homes in the surrounding neighborhood. Although jurisdictions often specify that the FAR of a project should be "compatible" with the surrounding neighborhood, this is generally not specifically

defined, and Staff is unaware of any jurisdictions that quantitatively define how similar a project's FAR must be to those of its neighboring homes. The Cities of Burbank and Monterey, as referenced in Issue Paper B, have created neighborhood compatibility worksheets for applicants to fill out. The worksheets ask for essentially qualitative information. For example, Burbank has a checklist on which applicants write whether their project's architectural style, type of parking access and roof design are similar to the "most prevalent" types in the surrounding neighborhood.

5A: Neighborhood Compatibility Worksheets for FARs.

Such neighborhood compatibility worksheets could be required to ask for quantitative information. For example, applicants could be required to write the FAR of their project along with the FARs of the 20 closest parcels. This would provide a measure of the average FAR in the neighborhood. The FAR of a project could then be capped at a certain percentage above the average FAR of the neighborhood, such as 125% or 150%. For example, projects in a neighborhood with an average FAR of .4 would not be allowed to exceed .5 if capped at 125% of average, or .6 if capped at 150%. Another method is to limit FARs to within a certain absolute value, such as .1 or .2, of the average neighborhood FAR.

Because of the difficulties of finding the precise FAR of several properties, applicants could instead be asked to round to the nearest .05 when providing the FARs of nearby properties. They could then tally the number of lots that fit into ranges of FAR values. For example, a neighborhood may have two properties with an FAR between .31 and .35, one property between .36 and .40, and so on. If this method were used, it may be better to use the median (middle value) and/or mode (most frequent value) to determine compatibility rather than the mean (average), or whichever is largest. The following chart is an example:

FAR range	Characteristics of 20 closest properties	
.31 to .35	2	
.36 to .40	1	
.41 to .45	1	
.46 to .50	4	Lowest Value Mode
.51 to .55	0	
.56 to .60	2	Mean Median (if using 10 th smallest FAR)
.61 to .65	3	Median (if using 10 th largest FAR)
.66 to .70	4	Highest Value Mode
.71 to .75	2	
.76 to .80	1	

The chart above is an example of the potential complexity of quantitatively determining a "representative" FAR for a neighborhood. It not only depends on whether one uses the mean, median or mode; the mode and median can be multiple values. In the above example, the middle of the range was used to calculate the mean. One possible solution is to select the highest mode and require the project not to fit in anything higher than the next highest category. An example of this calculation method is shown in Option 5B.

In order to provide a real-world example, Staff found lot area and floor area data for 14 of the 20 properties closest to 245 San Nicolas (in the Marine Terrace neighborhood) and calculated their FARs. The other six properties did not have information archived or in the Permit Plan system. Square footage data for the remaining six properties could be estimated by measuring the footprint of the structures using the City's GIS system, although it has not been done in the following example.

Characteristics of (14 of 20) Closest Properties to 245 San Nicolas

FAR range	Property Characteristics	
.16 to .20	4	Lowest Value Mode
.21 to .25	4	Highest Value Mode / Median
.26 to .30	1	Mean
.31 to .35	1	
.36 to .40	2	
.41 to .45	1	
.46 to .50	1	
.51 to .55	245 San Nicolas (.52 FAR)	

Advantages:

- Would allow gradual change over time in a manner likely to be compatible with existing neighborhoods.
- May help to ensure fairness and efficiency in the design review process by providing a quantitative way to evaluate projects.
- Accounts for the unique character of proposed project neighborhoods.

Disadvantage:

- Would add significant cost and time to the design review process for Staff and applicants.

5B: Neighborhood Compatibility Worksheet for Floor Area.

It is also possible to compare the floor area of a proposed project to the existing floor area of properties in a "study area" of the closest homes. It may make more sense to evaluate neighborhood compatibility in terms of floor area rather than FAR when nearby lots vary in size. For example, a home can be twice as large as its neighbor (in terms of floor area), yet have the same FAR if its lot is twice as large as well. In this case, the project may have a compatible FAR but an incompatible volume. Approximate square footage data would also be easier to find than FARs because precise lot size information would not need to be gathered.

A tallying system could be used as in Option 5A, but in the example below the highest allowed range is the one above the mode.

As in Option 5A, the square footage of a project could then be capped at a certain percentage above the average of the neighborhood. For example, a project's square footage may not be allowed to exceed 125% or 150% of the average neighborhood square footage. Another method would be to limit square footage to within a certain absolute value, such as 500 square feet above the average home size in the neighborhood. This method still has the disadvantage of needing to collect exact square footage data for several nearby parcels, which can be difficult.

A variation on this option is to require neighborhood study area square footage data collected to be accurate only within a 500 square foot range. The study area data could then be charted similar to Option 5A.

Characteristics of (14 of 20) Closest Properties to 245 San Nicolas

Square footage range	Property Characteristics	
1000 - 1500	6	Mode
1500 - 2000	4	Median, Mean
2000 - 2500	2	
2500 - 3000	2	
3000 - 3500	245 San Nicolas (~3060 sq. ft.)	

Advantages:

- See advantages listed under Option 5A.

Disadvantages:

- Large lots in predominantly small-lot neighborhoods would be allowed to build less than they would under an FAR regulation system, which may appear unfair to large-lot owners.
- Lot size information does not be to be gathered.
- Square footage information only needs to be accurate within a 500-foot range, avoiding the need to meticulously scale archived plan details to determine the exact square footage of a structure.

Option #6: FAR or Lot Coverage Maximums Varied by Slope.

Slope-based FARs are sometimes used because structures on hillsides are more likely to be visible from more areas. FAR or lot coverage maximums varied by slope can also indirectly limit grading and hillside alterations by not allowing as much floor area on sloped lots as on flat lots of the same size. Slope-based maximum FARs and lot coverage can be explored as part of the upcoming “Hillside Issues” Steering Committee discussion. Staff recommends that if time runs short on FAR discussions, the Option 6 discussion be deferred to the meeting where Hillside Issues are discussed by the Steering Committee.

6A: FAR Maximums Varied by Slope.

For this approach, if maximum FARs were adopted, the allowed FAR would be less for parcels with a large slope. As shown in the table below, the City of Belmont bases its FAR limits entirely on slope, with the maximum allowed FAR becoming more restrictive as the slope increases.

Slope-Based FAR Maximums in the City of Belmont	
Slope	Maximum allowed FAR
10% and less	.53
11%	.53
12%	.53
13%	.52
14%	.52
15%	.51
20%	.48
25%	.44
30%	.40
35%	.34
40%	.29
45% and up	.27

Advantage:

- Allows less development on steeper lots where visual impact is likely to be greatest.

Disadvantages:

- More complicated than FARs that do not account for slope.
- Does not account for variations in slope across a lot.

6B: FAR Maximums Varied by Slope and Lot Size.

The City of Beverly Hills has developed a complicated method to address both slope and lot size. The method may be introduced as part of the hillside issues discussion.

6C: Lot Coverage Maximums Varied by Slope.

Staff is not aware of any jurisdictions that base coverage requirements on slope, but principles similar to slope-based FARs could apply. For example, the maximum allowed lot coverage could be reduced for steeply sloped lots.

Option #7: FAR Incentives for “Good Design.”

It is fairly common among jurisdictions with FARs to make requirements less restrictive in exchange for desirable design elements. Following is a table showing desired elements and accompanying allowed FAR increases in the City of Redondo Beach. This city has established an FAR of .65, but allows cumulative increases of FAR up to .8 if “good design” elements are included in a project.

FAR Increases for “Good Design” Elements in Redondo Beach	
<i>“Good Design” Elements</i>	<i>Allowed FAR increase</i>
Front porch	.04
Rear or alley loaded covered parking	.04
Side loaded covered parking	.02
Additional second floor side setback	.04
Additional second floor rear setback	.04
Bermuda or Hollywood driveway ²	.02
Front yards with less than 30% coverage	.02

The City of Santa Barbara’s existing good-neighbor policies and ABR triggers may translate well within the context of this option. For example, the good-neighbor policies encourage residents to orient balconies and second-story windows to protect the privacy of neighbors. There are numerous design criteria under the NPO that must be met to exempt a project from ABR review, but more restrictive versions of these exemptions could be made into good-design incentives. Other potentially desirable design criteria are listed in the table below.

Potential FAR Increases for “Good Design” Elements in Santa Barbara		
<i>Source</i>	<i>“Good Design” Elements</i>	<i>Allowed FAR increase</i>
ABR Exemption Criteria	Height less than 17 feet	?
ABR Exemption Criteria	One architectural style	?
ABR Exemption Criteria (Variation)	Second-story setback of 150% of interior setback width for 100% of exterior walls	?
ABR Exemption Criteria (Variation)	No cantilevers	?
ABR Exemption Criteria (Variation)	No retaining wall	?
ABR Exemption Criteria (Variation)	No front yard fences or retaining walls over three feet	?
ABR Exemption Criteria (Variation)	No specimen trees removed	?
Single-Family Design Guidelines Good Neighbor Policy	Second-story windows oriented to protect neighbors’ privacy	?
Good Neighbor Policy (Variation)	No second-story balconies oriented to side or rear yards	?
NVS comment (see Option #8)	Recorded one-story only condition	?
Issue Paper C Discussion	Average plate height less than 9 feet	?

² Bermuda or Hollywood driveway: Contains three-foot-wide grass strip in the middle of the driveway.

Issue Paper C Discussion	Adobe walls	?
Issue Paper C Discussion, NVS San Roque Public Comment	Green building techniques, including permeable auto access	?
NVS Discussions	Style conforms to the traditional form of the style chosen and project proposes only high-quality exterior materials.	?
Consultant Recommendation	Front porch	?
Consultant Recommendation	Side loaded covered parking	?
Consultant Recommendation	Additional second-floor side setback	?
Consultant Recommendation	Additional second-floor rear setback	?
Consultant Recommendation	Mature, healthy tree present in front yard	?

If Option 5B were implemented instead of maximum FARs, “good design” elements such as the ones above could add to a project’s maximum allowed square footage. Conversely, discouraged project elements such as modifications could be “docked” FAR amounts.

Details regarding “good design” FAR incentive programs are on page 10 of the City of Redondo Beach Residential Design Guidelines (located in the Steering Committee Reference Binder).

- Unlike maximum FARs alone, encourages specific good-design elements.
- May be perceived by applicants as less restrictive.

Disadvantage: It is uncertain how many projects would be close enough to the FAR threshold for applicants to take advantage of the bonuses. The maximum FAR limits may have to be fairly substantial for applicants to include these items in their project designs.

Option #8: One-Story Recorded Condition.

8A: Allow Encroachment upon Required Open Space (San Roque Resident Request).

Single-family lots in the City are required to provide 1,250 square feet of open space, but public comment during the San Roque NVS meeting suggested a neighbor could reduce open space in exchange for a recorded condition that the house will never exceed one story. It is possible some applicants would prefer being able to build on more of their lot rather than adding a second story. The City of Sunnyvale allows one-story, but not two-story, homes to encroach into 25% of required yard area.

Advantage: Some applicants may decide to not build a second story.

Disadvantage: Loss of open space.

8B: Less Restrictive FAR or Lot Coverage Requirements.

FARs and lot coverage could be capped at different maximums for two-story homes than one-story homes. Staff is not aware of any jurisdictions with different maximum FAR requirements for one-story homes versus two-story homes, although two-story homes are more likely to appear too voluminous. The number of applicants choosing not to add a second story could increase if higher FARs are allowed for one-story homes. Property owners seeking to build as much square

footage as possible would not exceed one story. However, when FARs are the same regardless of the number of stories, it is logical for homeowners to build a second story because they can add just as much square footage without decreasing their open space, and may gain views in some cases. Lower maximum FARs for two-story homes would imply fewer two-story homes is more important than maintaining open space.

Advantage:

- Could result in fewer two-story homes.

Disadvantages:

- Well-designed two-story homes are not necessarily less acceptable to a neighborhood than one-story homes, and can perhaps be deemed even more compatible despite higher FARs.
- Potential loss of open space.

Option #9: Flexible Covered Parking Requirements.

Legally non-conforming projects in the City with only one of the required two covered parking spaces do not have to provide two covered parking spaces unless they expand by more than 50%. It is difficult on some lots to increase garage size without tearing down the existing garage and home. Therefore, it may be reasonable to allow expansions of over 50% without two covered parking spaces as long as certain conditions are met. Such conditions may include a low FAR or limited number of bedrooms. Also, on constrained lots, the required two covered spaces could be modified to one covered and one uncovered parking space in order to provide design flexibility. Trading parking standard compliance for lower FARs or lot coverage would allow residents to expand without increasing the lot area devoted to parking. This would in turn decrease the likelihood that the applicant would need to significantly restructure the house.

9A: Low Project FARs

Homes could be allowed to expand by more than 50% without the requirement of an accompanying increase in covered parking spaces as long as the FAR did not exceed a certain value. Alternatively, the required increase in covered parking spaces could be waived when the lot coverage is low; however, the City's setback and open-space requirements are such that it is already unlikely for conforming homes on small lots to have a large lot coverage. For example, conforming homes cannot cover much more than one-third of a 6,000-square-foot lot in most single-family zones (which is more restrictive than most jurisdictions' explicit coverage requirements). Expansions on small lots may become, on average, more modest in size if this option is implemented. However, it is also possible that a more flexible process will encourage more expansions overall.

Advantages:

- Less major remodeling may result than may have resulted if applicants had to provide two covered parking spaces.
- Resulting more modest remodels would be more likely to be compatible with their surrounding neighborhood.

Disadvantages:

- Typical remodels may become smaller, yet more numerous.
- One parking space per home is likely to have an on-street parking impact when new bedrooms are added if additional adults with automobiles inhabit the new rooms. On-street parking is particularly a concern in constrained hillside areas such as the Riviera.

9B: Limited Number of Bedrooms.

Because of the possibility of parking worsening if Option 9A were implemented, it may be wise to not require two covered parking spaces if the house will contain a certain number of bedrooms or fewer rather than basing parking standards on 50% expansions. An example of this option is to waive the requirement of two covered spaces when a project will result in only two bedrooms.

Advantage:

- See advantages listed under Option 9A.

Disadvantages:

- May lead to need for increased scrutiny of open floor plans to ensure unpermitted bedroom conversions are not planned.
- Requiring only one parking space per lot may be inadequate, as United States census figures report there is an average of approximately two vehicles per household nationwide.

9C: One Covered and One Uncovered Space for Constrained Lots.

A way to require two parking spaces while maintaining design flexibility is to require one covered and one uncovered parking space rather than two covered spaces. If projects would require a modification to expand an existing garage or substantial reconfiguration to meet the two covered parking spaces requirement, the applicant could be allowed to provide only an uncovered space in addition to the existing covered space.

Advantages:

- Greater design flexibility for remodels.
- Two parking spaces are provided per lot.

Disadvantage:

- Uncovered parking spaces may be visually unappealing.

Option #10: “Built Out” Home Considerations.

New FAR or lot coverage limits that would prevent any expansion for homeowners with structures that already exceed the limits upon adoption may be perceived as unfair. If maximum FARs or lot coverage requirements are adopted, it may be appropriate to allow reasonable expansions of structures made legally non-conforming as to FAR or lot coverage. Legally non-conforming structures are allowed to remain in place, but are not allowed to be added on to in a way that makes the structure further non-conforming. The City could allow additions that lead to no more than a certain percent (such as 10%) expansion of a structure’s size since the NPO revision, regardless of adopted FAR or coverage limits. The expansions should be allowed for legally non-conforming homes in terms of FAR or lot coverage.

Advantage: Would help allay concerns regarding new restrictions for current residents who have already expanded homes.

Disadvantage: Projects of inappropriate volume may be expanded under this exception.

Option #11: Alternatives to FAR or Lot Coverage Requirements.

11A: Second-Story Setback Requirements.

Second-story setback requirements prevent the volume of second stories from being located near the edge of the building, making tall, uninterrupted walls less likely. A large enough second-story setback distance can currently prevent a project from triggering ABR review, but the Steering Committee may wish to codify a mandatory second-story setback for all projects. For example, the current NPO Finding 13c³ could be codified as a standard that all structures must meet on all sides of a second-story structure.

Staff members from other jurisdictions have commented that second-story setback requirements are not always popular among architects because they can limit flexibility by encouraging a home's second-story volume to be centered in a lot, sometimes referred to as the "wedding cake effect."

Advantages:

- Regulates where on a lot a structure's volume is located.
- Privacy, light and noise issues from a second story would be better addressed than currently.

Disadvantages:

- Would be less flexible than current standards.

11B: Limit Second Stories to a Certain Percentage of First-Floor Footprint.

One purpose of FAR limits is to account for incompatibly large second stories. Jurisdictions with a goal of regulating second-story volume may choose to explicitly limit the size of second stories to a certain percentage of the first story, such as 40%. The City of Sunnyvale's Design Guidelines state that the area of the second floor should not exceed 35% of the first floor. The City of San Rafael limits upper-story additions to 75% of maximum lot coverage on lots of 5,000 square feet or greater, and 50% of maximum lot coverage⁴ for lots less than 5,000 square feet. Staff recommends that if this option is implemented, covered parking should be included in first-story footprint calculations. The City of Palo Alto's single-family individual review guidelines, in the Steering Committee Reference Binder, specifically focus on second-story additions.

Advantages:

- Addresses second-story issues specifically, unlike FARs, which address second stories indirectly.
- Allows more architectural flexibility than 11A.

Disadvantage:

- Does not control where the volume of a structure is located on the lot, which can lead to tall, uninterrupted walls.

⁴ Maximum lot coverage in San Rafael single-family zones ranges from 20% to 40%

11C: Angle Plane Requirements.

Angle-plane, or “daylight plane,” requirements effectively create second-story setbacks by creating a maximum roof height line that slants inward and upward from another point on the property. For example, the City of Palo Alto’s side daylight planes start 10 feet up at the side property lines and then move inward and upward at a slope of 45 degrees. Building above this line is prohibited. A rear daylight plane starts 16 feet up at the rear setback line (20 feet from the rear property line) at a slope of 60 degrees. The two figures from the City of Palo Alto on the following pages illustrate this.

The City of Santa Barbara has a solar ordinance requiring similar planes, but not on all sides of a structure. The solar ordinance aims to prevent homes from casting a shadow on neighbors, whereas a daylight plane is more directly capable of preventing apparent inappropriate volume. The City’s solar ordinance applies only to northerly property lines (in order to prevent shadows cast by the southerly sun) whereas the daylight plane regulations in Palo Alto apply to all sides.

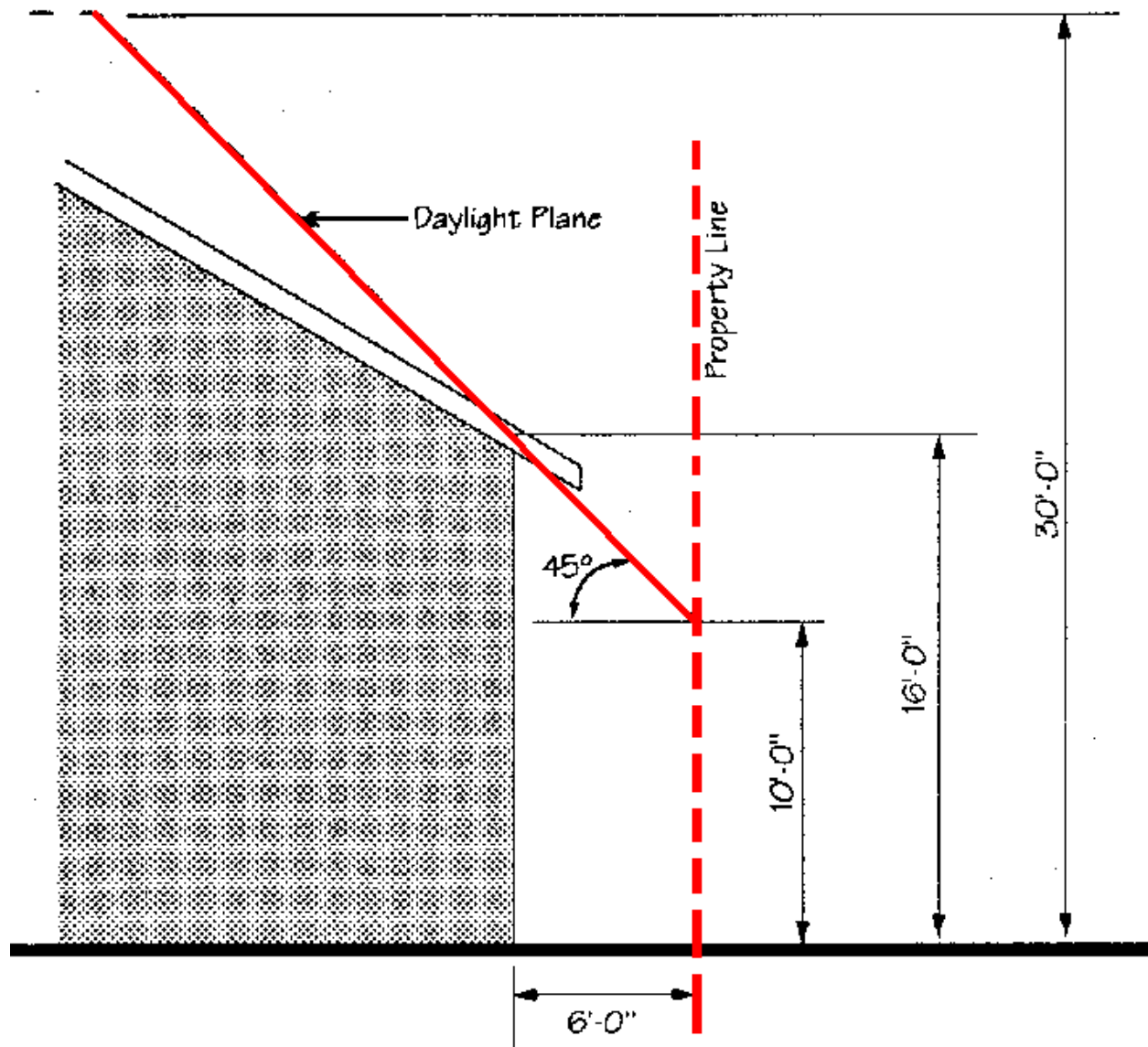
Advantages:

- Allows for a gradual increase in height.
- Allows for more architectural flexibility than options 11A and 11B.

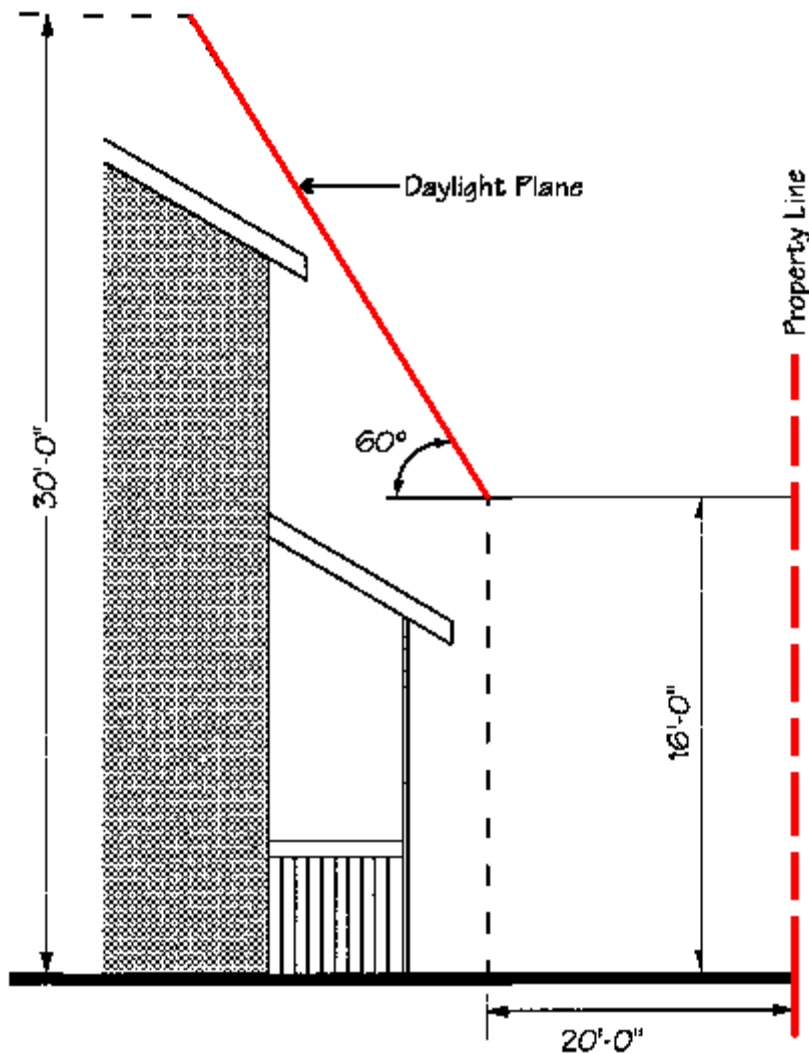
Disadvantage:

- Choosing appropriate angle, starting heights and distance from the building is not mathematically intuitive.

**Side Daylight Plane Requirements
City of Palo Alto
(note allowable eave protrusion)**



Front and Rear Daylight Plane Requirements City of Palo Alto



Option #12: Steering Committee Crafted.

The Steering Committee may combine various above options and craft unique FAR and/or lot coverage requirements.

Attachments

Issue Paper Worksheet.

Comparative tables:

- 1) FARs in Other Jurisdictions by Restrictiveness – Smaller Lots
- 2) FARs in Other Jurisdictions by Restrictiveness – Larger Lots
- 3) FARs by Jurisdiction – Detailed
- 4) Lot Coverage Requirements of Other Jurisdictions
- 5) Lot Coverage Requirements of Other Jurisdictions by Restrictiveness
- 6) Maximum Coverage by Lot Size and Zone in Other Jurisdictions